

JAP:CAC

**M-10-184**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

MOHAMMED AMADU,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

DONALD A. FARRIER, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about February 23, 2010, within the Eastern District of New York and elsewhere, defendant MOHAMMED AMADU did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


1. At approximately 7:50 p.m. on February 23, 2010, defendant MOHAMMED AMADU, a citizen of <sup>Ghana (acc) DF</sup> ~~the United States~~, arrived at John F. Kennedy International Airport in Queens, New York, aboard Delta Airlines flight No. 167 from Accara, Ghana.

2. Defendant MOHAMMED AMADU was selected for a routine customs examination. During the routine examination, the defendant claimed ownership of, among other items, a black "Express" suitcase (the "Suitcase") with tag #DL796996. Upon examination of the Suitcase, the Customs and Border Protection ("CBP") officer noticed a false bottom.

3. Thereafter, CBP officers probed the Suitcase and a light brown powdery substance was found. The powder field-tested positive for heroin. Defendant MOHAMMED AMADU was then placed under arrest.

4. The total approximate gross weight of the heroin seized from the defendant MOHAMMED AMADU's suitcase is 3,200.6 grams.

WHEREFORE, your deponent respectfully requests that defendant MOHAMMED AMADU be dealt with according to law.

  
DONALD A. FARRIER  
Special Agent  
Immigration and Customs  
Enforcement

Sworn to before me this  
24th day of February, 2010

THE HONORABLE CHERYL L. POLLAK  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK